

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

ROBERTO CLAROS, et al.

Plaintiffs

v.

SWEET HOME IMPROVEMENTS, INC et al.

Defendants

Case No. 1:16-cv-00344-AJT-MSN

Defendants' Rule 26(a)(1) Initial Disclosure

Defendants Sweet Home Improvements, Inc. ("Sweet Home"), Myung Kwan Koo, and Miae Koo (collectively "Defendants"), make the following initial disclosure pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

1. **FRCP 26(a)(1)(A)(i):** The name and, if know, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claim or defenses, unless solely for impeachment.

RESPONSE: Those who have knowledge as to Plaintiffs' work are as follows:

- Myung K. Koo, president of Sweet Home Improvements, who interviewed each individuals named as Plaintiff and who has knowledge of their work and work times.
- Mia Koo, vice president of Sweet Home Improvements, who was present when Myung Koo interviewed each individuals named as Plaintiff and who has knowledge of their work and work times.
- Other Sweet Home workers at the job site, investigation still ongoing.
- Owners of the property where the work was performed, investigation still ongoing.
- Any individual named by any Plaintiffs in its initial disclosures or interrogatory answers may also have discoverable information regarding this matter.

2. **FRCP 26(a)(1)(A)(ii).** A description by category and location of all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

RESPONSE: All of the following documents are presently located in the office of Defendant's counsel:

- Sweet Home Improvements, Inc., corporate registration summary sheet, and annual reports filed from 2013 – 2016.
- Payroll summary for all Plaintiffs.
- Copies of cancelled checks issued to Plaintiffs for payment of work.
- Any document listed by or provided by any Plaintiffs in their initial disclosures or in responses to any discovery request.
- Any document provided by any party in response to a subpoena duces tecum.

3. **FRCP 26(a)(1)(iii).** A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE: None at this time, but Defendants reserve the right to supplement this answer upon further investigation.

4. **FRCP 26(a)(1)(A)(iv).** For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: Not applicable to Defendants. Defendants have a general contractor insurance coverage for damages to property, personal injuries suffered during construction, and loss of equipment coverage; but none covering nonpayment of wages.

Respectfully submitted,

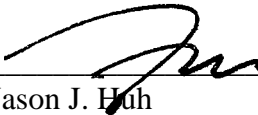
SWEET HOME IMPROVEMENTS, INC.
MYUNG KWAN KOO, and
MIAE KOO
By Counsel



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CERTIFICATE OF SERVICE

On this April 27, 2016, I certify that a true copy of the foregoing Defendants' Rule 26(a)(1) Initial Disclosure was emailed and mailed, postage prepaid, to the following individual: Nicholas C. Marritz, Esq., LEGAL JUSTICE CENTER, 6066 Leesburg Pike, Ste. 520, Falls Church, VA 22041 <nicholas@justice4all.org>



Jason J. Huh